well as the step of "creating an identification tag by performing a cryptographic function on said *function of the document* and a unique processor identifier associated with said computer system." Moreover, claim 2, which is dependent from claim 1, explicitly recites that "said function of the document is a hash function" (emphasis added). (Similarly, independent apparatus claim 8, together with claim 9, dependent therefrom, and independent apparatus claim 14, together with claim 15, dependent therefrom, each explicitly recite equivalent limitations thereto.)

Mi et al., on the other hand, is directed to a "system and method for *controlling access to an object*" with use of a "verification agent that can access *information embedded in a processor* and then calculate from that embedded information a value that may be compared with the stored processor identifier," and a "comparison agent . . . to compare that value with the processor identifier to determine whether the processor corresponds to the processor identifier," in which case "the computer grants the user *access to the object*." (See Mi et al., abstract, emphasis added.)

Nowhere, however, does Mi et al. teach or suggest either "calculating a function of a document" or "performing a cryptographic function on [a] function of the document and a unique processor identifier." Moreover, nowhere does Mi et al. teach or suggest the use of a *hash of a document*. Assuming that the "objects" of Mi et al. may, in fact, comprise "documents" (since there are no other "documents" disclosed in Mi et al.), there is nonetheless no teaching or suggestion whatsoever in Mi et al. that these "objects" themselves be used for any purpose at all (other than as an "object" to which access is either allowed or not allowed), and certainly not that they be used to calculate a function (such as, for example, a hash) thereof, or be used in the computation of any cryptographic function, as is required by the instant claims. As such, there are clearly no "documents" (or "objects") in Mi et al. which are themselves used to calculate a function (*e.g.,* a hash) thereof, or to perform a cryptographic function on such a function thereof.
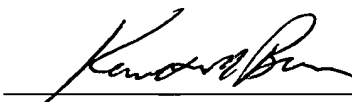
Specifically, the Examiner has cited Mi et al. column 3, lines 7-16 as allegedly disclosing "calculating a function of the document." But Applicants respectfully submit that that portion of Mi et al. describes neither "documents" nor "objects" at all. Rather, the only function which that portion of Mi et al. suggests be calculated is a value associated with embedded processor information (*e.g.,* a processor number) that may be compared with a processor identifier. Nowhere does that portion of Mi et al. teach or suggest "calculating a function of the document" or, for that matter, a function of

an "object." Similarly, none of the other passages of Mi et al. cited against independent claims 1, 8, and 14 (column 3, lines 17-33, column 4, lines 1-20 or column 4, lines 48-65) teach or suggest "calculating a function of the document" or "performing a cryptographic function on [a] function of the document and a unique processor identifier," as is required by the instant claims. In fact, the only cryptographic function and/or hash function which may be arguably taught or suggested by Mi et al. is that described in column 4, lines 24-34 thereof, which is that portion of Mi et al. cited by the Examiner against dependent claims 2, 9 and 15 (which recite that "said function of the document is a hash function"). However, that portion of Mi et al. discloses only functions based on the aforementioned embedded processor information, a "secret key" and a "session identifier," as well as possibly another value such as a "server identifier." None of the functions disclosed in Mi et al. – whether cryptographic, hash, or otherwise – are based on any "documents' or "objects" thereof.

For the above reasons, therefore, Applicants respectfully submit that each of independent claims 1, 8 and 14 are patentable over Mi et al. And since each of the remaining claims (*i.e.,* dependent claims 2-7, 9-13 and 15-20) depend from one of these independent claims, each of these dependent claims are patentable over Mi et al. as well. Therefore, Applicant submits that all of the instant claims are patentable over the cited references and that the instant application is in condition for allowance. Reconsideration of this application is respectfully requested in light of this submission. The Examiner is invited to telephone Applicant's attorney, Kenneth M. Brown, at (908) 582 – 5998, should there be any questions or issues for discussion in the reconsideration of the pending application.

Respectfully,

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